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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KYLE MITRIONE AND
KAROLINA MELSKA, H/W

Case No.: 2:24-cv-00916

Plaintiffs,

vs.

CIRQUE DU SOLEIL AMERICA
NEWCO, INC., CIRQUE DU SOLEIL
NEVADA NEWCO, INC., CIRQUE
DU SOLEIL VEGAS, LLC, CIRQUE
DU SOLEIL HOLDING USA NEWCO,
INC., CIRQUE APPLE LAS VEGAS,
LLC, CIRQUE APPLE
ADMINISTRATION, LLC, DOES I
THROUGH X, AND ROE
CORPORATIONS I THROUGH X

STIPULATION AND [PROPOSED]
ORDER TO RESCHEDULE
HEARING ON MOTION FOR A
MORE DEFINITE STATEMENT
[ECF 8]
(First Request)

COME NOW Plaintiffs, Kyle Mitrione and Karolina Melska, by and
through their attorneys, Michael A. Budner, Esq., of the law firm of Saltz
Mongeluzzi Bendesky, P.C., and Defendants, Cirque Du Soleil America Newco,
Inc., Cirque Du Soleil Nevada Newco, Inc., Cirque Du Soleil Vegas, LLC, Cirque

1 Du Soleil Holding USA Newco, Inc., Cirque Apple Las Vegas, LLC, and Cirque
2 Apple Administration, LLC, by and through their attorneys Michael C. Mills, Esq.,
3 of the law firm of Bauman, Loewe, Witt & Maxwell PLLC, and hereby stipulate
4 to continue the Hearing on Motion for More Definite Statement [ECF 8] currently
5 scheduled for June 27, 2024 at 11:00 a.m. to a later date at the Court's convenience.

6 This is the first requested continuance of this matter.

7 The Defendants' Motion for a More Definitive Statement [ECF 8] was filed
8 on May 20, 2024.

9 Plaintiffs' Response to Defendants' Motion for a More Definite Statement
10 [ECF 17] was filed on June 3, 2024.

11 Defendants' Reply to Plaintiffs' Response to Defendants' Motion for More
12 Definite Statement [ECF 24] was filed on June 14, 2024.

13 The Hearing on Defendants' Motion [ECF 8], Plaintiffs' Response [ECF 17],
14 and Defendants' Reply [ECF 24] is currently scheduled for June 27, 2024 at 11:00
15 a.m. [ECF 13].

16 The parties agree to a continuance of the June 27, 2024 hearing date with
17 the Court's permission.

18 The parties have cleared two (2) potential dates with all counsel and the
19 Court: July 1, 2024 and July 8, 2024.

20 The parties respectfully stipulate, agree, and request that the hearing
21
22
23

1 currently scheduled for June 27, 2024 be rescheduled for July 1, 2024 or July 8,
2 2024.

3 **Submitted and Prepared By:**

4 **SALTZ MONGELUZZI BENDESKY, P.C.**

5 /s/ Michael Budner
MICHAEL A. BUDNER, ESQ.
One Liberty Place
6 1650 Market Street, 52nd Floor
Philadelphia, PA 19103
7 *Attorneys for Plaintiffs*

8 Dated: 6/18/24

9 **Approved as to Form and Content:**

10 **BAUMAN LOEWE WITT & MAXWELL, PLLC**

11 /s/ Michael C. Mills
MICHAEL C. MILLS, ESQ.
12 Nevada Bar No. 003534
3650 N. Rancho Drive, Suite 114
13 Las Vegas, NV 89130
Attorneys for Defendants

14 Dated: 6/18/24
15

16
17 **ORDER**

18 IT IS SO ORDERED, pursuant to the Stipulation of parties, that the Hearing
19 on Defendants' Motion for a More Definite Statement [ECF 8] scheduled by this
Honorable Court for June 27, 2024 [ECF 13] is hereby continued until _____

20 July 1, 2024, at 2:00 p.m.

21 
UNITED STATES MAGISTRATE JUDGE

22 DATED: June 20, 2024
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